



## PRIVACY STATEMENT NewSteps project

### Privacy statement and information to the data subject (Articles 13 and 14 of General Data Protection Regulation (2016/679))

|                                                             |                                                                                                                                                                                                                                                                                              |
|-------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>1. Name of privacy statement</b>                         | NewSteps project privacy statement                                                                                                                                                                                                                                                           |
| <b>2. Controller</b>                                        | <b>Name</b><br>Savonia University of Applied Sciences Ltd.<br><br><b>Address</b><br>PL 6, 70201 Kuopio<br><br><b>Other contact information (e.g. work telephone, email address)</b><br>savonia@savonia.fi                                                                                    |
| <b>3. Contact person in matters concerning the register</b> | <b>Name</b><br>Johanna Partio, johanna.partio@savonia.fi<br><br><b>Telephone</b><br>+358447857417                                                                                                                                                                                            |
| <b>4. Data protection officer</b>                           | Administrative Coordinator Mervi Hättinen,<br>tietosuojavastaava@savonia.fi                                                                                                                                                                                                                  |
| <b>5. Data subjects</b>                                     | Data subjects are participants of NewSteps project activities, including interviews, roundtables, national and international events, and the blended course.                                                                                                                                 |
| <b>6. Legal basis for data processing</b>                   | Consent of the data subject (GDPR Article 6(1)(a)). Participation in NewSteps project activities is voluntary, and personal data is collected and processed only for the purposes described in this privacy statement. The data subject has the right to withdraw their consent at any time. |



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| <b>7. Purpose of personal data processing</b>                         | Personal data will be used to NewSteps-project's capacity building programme including research and blended course, raising awareness campaigns and project events.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>8. Personal data content and retention periods of the register</b> | <p>The personal data processed may include the participant's name, organisation, role/title, email address, telephone number, country, and information related to participation in NewSteps project activities, such as registration information, consent forms, interview or roundtable participation, course participation, and event attendance.</p> <p>Personal data will be retained only for as long as necessary for the purposes of the NewSteps project, including project implementation, reporting, monitoring and auditing obligations. The personal data for blended course certificate (open badge) will be archived by Savonia University of Applied Sciences. Other personal data will be destroyed in the end of the project.</p> |
| <b>9. Regular sources of data</b>                                     | Personal data is collected directly from the data subjects themselves, for example through registration forms, consent forms, interviews, roundtables, course participation, events and other NewSteps -project activities.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>10. Regular disclosure of data</b>                                 | Personal data is not regularly disclosed to external parties. Personal data may be shared between NewSteps project partners only when necessary for the implementation of the project activities, reporting, monitoring or other project-related purposes. Data is shared only to the extent necessary and in accordance with applicable data protection legislation. All project partners are located within the EU.                                                                                                                                                                                                                                                                                                                              |
| <b>11. Transfer of data outside the EU or EEA</b>                     | Data is not transferred outside the EU or EEA.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>12. Principles for protection of the register</b>                  | <p><b>A Manual documentation</b></p> <p>Possible manual documentation, such as participant name lists collected at events, is handled confidentially and stored securely. Manual documentation is destroyed securely when it is no longer</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |



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|                                   | <p>needed or once the necessary information has been documented digitally.</p> <p><b>B Computer-processed data</b><br/> Savonia University of Applied Sciences is committed to processing personal data in a confidential and secure manner. Only those persons who have the right to process the personal data in question for their work are entitled to use the system containing personal data. Each user has their own username and password for the system.</p> <p>Databases containing personal data are protected by firewalls, passwords and other technical means. The databases and their backups are located in the cloud service and only certain pre-designated persons can access the data.</p>                                                                                                                                                                    |
| <b>13. Rights of data subject</b> | <p>For questions related to the rights of the registered person, you can contact the contact person of the register or the data protection officer.</p> <p>Under the EU's GDPR (2016/679) the data subject has the following rights:</p> <p><b>Right of access to their data</b><br/> The data subject has the right to receive from the controller confirmation on whether or not the personal data concerning them is processed. The data subject has the right of access to the data. A fee may be charged for the right of control. The data subject's request for control may be refused if the requests are manifestly unfounded or unreasonable and especially if made repeatedly. (Articles 12 and 15)</p> <p><b>The right to rectification</b><br/> The data subject has the right to demand rectification of inaccurate personal data concerning them. (Article 16)</p> |



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|  | <p><b>The right to erasure</b><br/>         With certain restrictions specified in the General Data Protection Regulation, the data subject has the right to have the controller erase the personal data concerning him or her. There is no right to deletion if we process your personal data to comply with a legal obligation or if the processing of your personal data takes place for the performance of a task in the public interest or for the exercise of public authority belonging to University of Applied Sciences. (Article 17)</p> <p><b>The right to restriction of processing</b><br/>         With certain exceptions specified in the General Data Protection Regulation the data subject has the right to request the controller to restrict the processing of personal data concerning him or her. (Article 18)</p> <p><b>The right to data portability</b><br/>         The data subject has the right to receive the personal data that he or she has provided to a controller in a machine-readable format when the processing is based on consent and is automated. (Article 20)</p> <p><b>The right to object</b><br/>         The registered person has the right to object, on grounds related to his personal special situation, to the processing of his personal data, which is based on the processing is necessary for the performance of a task in the public interest or for the exercise of public authority belonging to the controller. The controller may no longer process personal data, except if the controller can demonstrate that there is a significantly important and justified reason for the processing that overrides the interests, rights and freedoms of the data subject, or if it is necessary to prepare, present or defend a legal claim. (Article 21)</p> <p><b>The right to withdraw consent</b><br/>         If the processing of personal data is based on the consent given</p> |
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|                                      | <p>by the registered person, the registered person has the right to withdraw the consent given to the processing at any time without affecting the legality of the processing carried out on the basis of the consent before this. (Article 7)</p> <p><b>The right to appeal</b><br/>The registered person has the right to file a complaint with the Office of the Data Protection Ombudsman, if one considers that valid data protection legislation has been violated in the processing of his personal data.</p> <p><a href="https://tietosuoja.fi/en/notification-to-the-data-protection-ombudsman">https://tietosuoja.fi/en/notification-to-the-data-protection-ombudsman</a> (in english)</p> |
| <b>14. Automated decision-making</b> | The data subjects of the register are not subjected to automated decisions.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |



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